

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In re: VICTOR MANUEL RIBAS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:24-cv-00632
	)	
MEGAN BESLER,	)	
	)	
Defendant.	)	

**JOINT MOTION FOR EXTENSION**

COME NOW Plaintiff and Defendant (the “Parties”), by and through their undersigned counsel, and file this Joint Motion for Extension, moving the Court as follows:

1. On April 4, 2024, the underlying action was filed in the Circuit Court of St. Louis City, State of Missouri.
2. On May 6, 2024, Defendant removed this matter to the U.S. District Court, Eastern District of Missouri.
3. Prior to removal, the Parties had discussed potential early resolution of this matter. These conversations continue and additional time is needed.
4. Additional time is also needed so that Plaintiff’s counsel Mr. Hoekel can compile the necessary paperwork to gain re-admission to this Court. *See* ECF 6.
5. Therefore, the Parties have agreed to continue and extend any initial pleading and response deadlines in this matter by an additional thirty (30) days. *See, e.g.,* Fed. R. Civ. P. 15.
6. By virtue of this agreement, the Parties will file any amended pleadings and/or responsive pleadings on or before June 14, 2024.
7. This motion is not meant for delay and will not prejudice the Parties. As such, for

good cause shown, the Parties hereby request that this Joint Motion be granted.

WHEREFORE, the Parties respectfully request the Court grant this Joint Motion pursuant to Fed. R. Civ. P. 6(b) and E.D.Mo. Local Rule 1.05, extend the pleading and other initial deadlines to June 14, 2024, and for such other and further relief as the Court deems just and proper.

Dated: May 16, 2024

Respectfully submitted,

KEANE LAW LLC

By: /s/ Tanner A. Kirksey  
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and

By: /s/ Marshall R. Hoekel (by consent)  
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*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 16, 2024, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the attorneys of record.

/s/ Tanner A. Kirksey